

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FEDERAL TRADE COMMISSION and
THE PEOPLE OF THE STATE OF NEW
YORK, by LETITIA JAMES, Attorney
General of the State of New York,

Plaintiffs,

v.

QUINCY BIOSCIENCE HOLDING
COMPANY, INC., a corporation;

QUINCY BIOSCIENCE, LLC, a limited
liability company;

PREVAGEN, INC., a corporation
d/b/a/ SUGAR RIVER SUPPLEMENTS;

QUINCY BIOSCIENCE
MANUFACTURING, LLC, a limited
liability company; and

MARK UNDERWOOD, individually and as
an officer of QUINCY BIOSCIENCE
HOLDING COMPANY, INC., QUINCY
BIOSCIENCE, LLC, and PREVAGEN,
INC.,

Defendants.

Case No. 1:17-cv-00124-LLS

**DECLARATION OF
TIFFANY M. WOO IN SUPPORT OF
PLAINTIFFS' MOTIONS IN LIMINE**

DECLARATION OF TIFFANY M. WOO

I, Tiffany M. Woo, declare as follows:

1. I am an attorney for the Federal Trade Commission in the above-captioned litigation against Corporate Defendants Quincy Bioscience Holding Company, Inc., Quincy Bioscience, LLC, Prevagen, Inc., and Quincy Bioscience Manufacturing, LLC, and Individual Defendant Mark Underwood (collectively, "Defendants"). I submit this declaration in support of Plaintiffs' Motions in Limine.

2. Attached as **Exhibit 1** is a true and correct copy of Defendants' Designations of the Deposition of Rosemary Rosso, served August 31, 2023.

3. Attached as **Exhibit 2** is a true and correct copy of excerpts from the transcript of the deposition of Rosemary Rosso dated January 29, 2021.

4. Attached as **Exhibit 3** is a true and correct copy of excerpts from the transcript of the deposition of Mark Underwood dated August 20, 2020.

5. Attached as **Exhibit 4** is a true and correct copy of Plaintiffs' Amended Unopposed Motion for Preliminary Approval of Class Action Settlement and Certification of the Settlement Class (with exhibits), dated June 24, 2020, and filed at ECF No. 147 in the case captioned *Collins v. Quincy Bioscience, LLC*, No. 1:19-cv-22864-MGC in the U.S. District Court for the Southern District of Florida ("Collins Pls.' Unopposed Motion").

6. Attached as **Exhibit 5** is a true and correct copy of the Docket Report in the case captioned *Collins v. Quincy Bioscience, LLC*, No. 1:19-cv-22864-MGC in the U.S. District Court for the Southern District of Florida.

I declare under penalty of perjury that the foregoing is true and correct.

Date: October 24, 2023

/s/ Tiffany M. Woo
TIFFANY M. WOO

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of October, 2023, I have caused service of the foregoing Declaration of Tiffany M. Woo in Support of Plaintiffs' Motions in Limine to be made by electronic filing with the Clerk of the Court using the CM/ECF system, which will send a Notice of Electronic Filing to all counsel of record.

Dated: October 24, 2023

/s/ Tiffany M. Woo
Tiffany M. Woo
Federal Trade Commission